

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Stephanie L. Jones,	:	
	:	
Plaintiff,	:	
	:	
vs	:	Case No. 1:19-cv-11573 (AKH)
	:	
Fox Rothschild LLP and Ian W. Siminoff,	:	
	:	
Defendants.	:	

Plaintiff's Notice of Motion for Leave to File Sur Reply Memorandum of Law in Response to Defendant Fox Rothschild LLP's Reply Brief in Further Support of Defendant Fox Rothschild LLP's Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(3) and for Partial Dismissal Under Fed. R. Civ. P. 12(b)(6)

TO: Rosemary S. Gousman
Kathleen McLeod Caminiti
Fisher Phillips LLP
430 Mountain Avenue, Suite 303
Murray Hill NJ 07974

Attorneys for Defendant Fox Rothschild LLP

Meredith Rosen Cavallaro
Courtney Patrice Fain
Paduano & Weintraub, LLP
1251 Avenue of the Americas
New York NY 10020

Attorneys for Defendant Ian W. Siminoff

PLEASE TAKE NOTICE that Plaintiff, Stephanie L. Jones, hereby moves the Court for leave to file a Sur Reply Memorandum of Law in Response to Defendant Fox Rothschild LLP's Reply Brief in Further Support of Defendant Fox Rothschild LLP's Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(3) and for Partial Dismissal Under Fed. R. Civ. P. 12(b)(6). The grounds in support of this Motion are set forth in the accompanying Memorandum of Law, which is incorporated herein by reference.

Wherefore, Plaintiff, Stephanie L. Jones, by and through her attorneys, respectfully requests that the Court grant her leave to file a Sur Reply Memorandum of Law in response to Defendant Fox Rothschild LLP's Reply Brief in Further Support of Defendant Fox Rothschild LLP's Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(3) and for Partial Dismissal Under Fed. R. Civ. P. 12(b)(6), which is attached hereto as Exhibit 1.

s/Tyrone Anthony Blackburn

Tyrone Anthony Blackburn
T. A. Blackburn Law, PLLC
1242 East 80th Street, 3rd Floor
Brooklyn NY 11236

and

Robert T Vance Jr
Law Offices of Robert T Vance Jr
100 South Broad Street, Suite 1525
Philadelphia PA 19110

Attorneys for Stephanie L. Jones